

PAUL ROPOLO

Plaintiff

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v.

Case No.

JAMES YATES, et al.,

19-CV-127-RAW-SPS

Defendants

PLAINTIFF'S AMENDED COMPLAINT  
DECLARATION FIVE

Pursuant to 28 U.S.C. § 1746, I Paul Roppolo, declare  
under penalty of perjury that the following is true and  
correct. Name: Paul Roppolo Signature: Paul R

Date: 04/20/20

PLAINTIFF'S FACTUAL DETAILED PLEADING(S), DEMONSTRATING  
TO ESTABLISH THAT AS A DIRECT RESULT OF DEFENDANT(S) ADEA,  
YATES, BROWN [AND SUCH GUARDS CARRYING OUT THEIR  
SUPERVISORY DIRECTIVES AGAINST MYSELF] PURPOSEFUL ACTION(S)  
TO RETALIATE AGAINST MYSELF (AS ADVERSE ACTION AGAINST MY  
CONDUCT OF FREE SPEECH - MY RECORDED VOICED COMPLAINTS  
BEING PLACED UPON MY WEBSITE - AND MY FILING OF  
GRIEVANCES) BY PURPOSEFULLY CAUSING MYSELF TO BE IN  
IMMINENT SERIOUS PHYSICAL DANGER FROM ATTACK BY THE  
INMATES ON MY UNIT AND THE GUARDS THEMSELVES: RENDERED  
MYSELF MENTALLY AND PHYSICALLY UNABLE TO EXERCISE OR  
BATHE WITHIN THE CONFINES OF MY CELL AS WELL



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I lived in absolute terror of my own custodians [ADEA, YATES, BROWN, and the prison guards working under their direct orders] action(s) of retaliation against myself.

The terror of instant and unexpected death made imminent to myself directly from my custodian(s) [ADEA, YATES, BROWN, and prison guards] verbal threats and verbal promises of my death, which were backed up with clear action(s) to place my very life at serious danger and risk of physical death, caused myself to suffer unending multiple panic-attacks and seizures within my cell, that the original psychotropic medication that I had been prescribed to treat my mani-depressive bipolar disorder, (which causes myself to suffer such panic-attacks and seizures, being directly triggered by external circumstances - such as traumatic life threatening - or - serious risk of grave bodily injury to myself), such medication was not at all effective during my 18 month incarceration.



at supermax Holdenville.

On a daily basis, I suffered multiple panic-attacks or an actual physical seizure, that causes myself to have to endure multiple hours of a 'recovery phase', before I am mentally and physically coherent again.

And it was DIRECTLY as a RESULT of these multiple serious panic-attacks and/or physical seizures that I suffered on a DAILY BASIS, (which my panic-attacks and physical seizures [from my mental disability of severe manic-depressive bipolar disorder and post traumatic stress disorder] were occurring at a more repetitive rate, and more severely incapacitating myself - DIRECTLY as a RESULT OF : ADEA's, YATE's, BROWN's [and guards carrying out their orders against myself] action(s) to retaliate against myself - by purposely placing and/or exposing my physical being to be in serious imminent danger of death or serious bodily injury) : DIRECTLY CAUSED myself to be physically-mentally incapacitated and UNABLE TO EXERCISE WITHIN MY CELL.



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1. On one hand, the physical effects of a severe panic-attack that suffer from : Massive body convulsions, body-and-extremities shaking uncontrollably, inability to 'catch your breath' is a sensation that feels as if you are physically suffocating-when I endure a panic-attack, chest pains and heart palpitations, as well as ongoing migraine headaches, are all documented medical symptom(s) that I, (and many others, whom suffer my mental disability of disorder), suffer from when I endure a panic-attack.

2. The physical effects of a seizure are identical to the above medical symptoms of a panic attack; however, a physical seizure carries even more [added] severe physically incapacitating symptoms : When I suffer a physical seizure, I also become physically violently stricken with body convulsions, but I am rigidly unable to unclench my teeth and my muscles all through my body become violently tense, and rigid, while I shake uncontrollably; also, I uncontrollably violently fall to the floor, and/or,



Fall into objects around myself, as the nature of seizures that I, (and others with my type of mental disability), suffer from, cause my brain and nervous system to severely malfunction, in the physical manifestation of the debilitating symptoms that I have described here.

3. And the psychosis of the mental delirium that I endure is exponential, when I suffer my prolonged panic-attacks. My psychosis when I suffer a panic-attack, is that I cannot trust any person, thing, or object. I believe that no person, thing, or object can save myself - or remedy and cure - the situation that I am being faced with - in my life at that time period(s) or moment, during my panic-attack(s). My mind and mental thought process is so absorbed in thought(s) of unending peril, suicide, and utter destruction of any hope of survival, that I do not have the mental capacity to divert back to 'normal' daily activities(s), such as attempting to EXERCISE WITHIN MY CELL.

Also, the psychosis of the mental delirium that I have



when I suffer a panic-attack is so exponential, that I do not have the mental capacity to divert back to other 'normal' daily activities(s), such as attempting to BATHE MYSELF WITHIN MY CELL.

4. On a daily basis, during the ENTIRE 18 MONTH incarceration at Holdenville Facility Supermaximum Security Prison, I suffered these multiple-panic-attacks for duration(s) of 16 to 20 hours a day. And six or seven days, out of every single week, I suffered a full blown seizure, from the combined effects of my manic-depressive disorder and severe anxiety panic-attack disorder.

And on a DAILY BASIS, it was during the remaining 4 to 8 hours a day, (that I was not actually suffering the actual mental/physical episode of enduring the panic-attacks(s) and/or seizure itself), that a substantial majority of this sparse 4 to 8 hours remaining of the day : I spent lying upon the Floor of my cell or lying upon my bed, in the RECOVERY PHASE from



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enduring the debilitating severe episode(s) of such panic-attack(s) and physical seizure(s).

5. During a RECOVERY PHASE, from such physical seizure, and multiple severe anxiety-panic-attack(s), on a daily basis, the recovery phase is when my mind and body would finally 'shut-down' and I would be physically and mentally exhausted, lying prone upon the floor of my cell or my bed, in a dazed-state of exhaustion, physically resting with intermittent sleep, during these approximate 4 to 8 hours remaining of each day - at which I wasn't suffering the actual episode(s) of such severe anxiety panic-attacks and/or physical seizure.

6. And it was for a substantial amount of a majority of the remaining 4 to 8 hours each day, (at which I wasn't suffering the actual episode(s) of anxiety-panic-attack(s) and/or physical seizure), that I spent in such recovery phase.

7. And this is a Factual, detailed record, of my mental and physical condition WITHIN THE CONFINES OF MY CELL, for the ENTIRE 18 month incarceration at Holdenville Supermax.